

A02-0053 3/14/03



Application Form

Huntsman Polyurethanes

Name of facility*

Huntsman International, LLC

Name of parent company (if any)

286 Mantua Grove Road

Street address

Street address (continued)

West Deptford, NJ 08066-1732

City/State/Zip code

Give us information about your contact person for the National Environmental Performance Track Program.

Name Mr. Raymond L. Notaro, P.E.

Title Site Manager

Phone (856) 423-8560

Fax (856) 423-8591

E-mail raymond_l_notaro@huntsman.com

Facility/Company Website www.huntsman.com/pu

* If you are applying for multiple facilities, you must call 1-888-339-PTRK(7875)

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- ♦ Provide background information on your facility.
- ♦ Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Site Composition - The West Deptford site consists of a number of different organizational units including:

Manufacturing of specialty polyol blends. These operations are headed by a Production Manager. Operations of the manufacturing plant include:

- Raw material delivery and handling
- Blending of polyols in formulated products
- Warehousing and shipment

Each blended polyol system is produced from a specific formulation and preparation instruction which is developed for each customer's application

Depending on the application, one or more of a variety of chemical additives (including catalysts, cross-linking agents, chain extending agents, blowing agents, surfactants, colorants, fillers, flame retardants and ultraviolet light stabilizers) are blended with a polyol in one of six stainless steel blenders which range in size from 500 gallons to 7400 gallons. The raw materials used for blending are normally received in 55 gallon drums or in bulk quantities in 4000 gallon tank trucks or ocean de-mount containers. All materials are transferred by transfer pump, bulk charge pump or diaphragm pump. The contents are then blended with heating (depending on the blender, the heating is done by use of steam or hot water) and then cooled (by using either cool water or a chilled glycol/water solution) prior to discharge.

The blended polyol products are transferred to 55 gallon drums, 275 gallon totes or to 4000 gallon tank trucks, depending on the particular customer's handling requirements, and labeled. The majority of these products are then shipped directly to the customer (an isocyanate and the polyol are sold as a system to the customer who mixes the two components to yield the final polyurethane product). The remainder are produced to meet minimum/maximum requirements of various distribution warehouses and are shipped to those warehouses for ultimate distribution to the customer. The quantity and location of all raw materials are finished product blends are tracked by computer.

Headquarters for West Deptford Rigids Division comprises individuals involved with the Operations of the West Deptford Rigids Division Business including the following functions: Commercial, Sales/Marketing, Customer Applications Development. Technical Service and Product Scale-up.

The Product Development areas include two separate 10,000 square feet machine areas with associate laboratories. Development work is conducted to produce specialized rigid polyurethane materials for the appliance and construction industries. A variety of specialty equipment is used by trained technicians to simulate customer applications.

Business Resource Group staff personnel reporting to the BRG Director. This group includes, Site Services, Group EHS, Communications and Toxicology.

Various contract personnel operate at the site, some on a regular basis. These people, directly or indirectly, are responsible to the respective managers who have contracted for their services.

- 2 List the North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

NAICS
325211 _____

- 3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

- 4 How many employees (full-time equivalents) currently work at your facility? If you checked "Yes" in question 3 and have fewer than 50 employees at your facility, then you are considered a "small facility" by the Performance Track Program.

☐ Fewer than 50
☐ 50-99
☒ 100-499
☐ 500-1,000
☐ More than 1,000

- 5 Complete the Environmental Requirements Checklist on pages 32-38 of the instructions and enclose it with your application.

See attached

- 6 Optional: Is there anything else you would like to tell us about your facility? Do you participate in other voluntary programs at the local, tribal, State, or Federal level?

Yes, we are a OSHA Voluntary Protection Program (VPP) STAR site. The STAR status was awarded to the site in April, 2001.

We have received the following awards concerning our EHS programs at this site:

Chemistry Council of New Jersey 2002 "Chairman's Award" for mangement practices that demonstrate excellence and commitment to community, customer, shareholder and employee expectations in the area of environmental health and safety performance.

American Red Cross G.E.M. award for the highest giving rate 2002 for Blood Donors

NJ 2002 Governor's Occupational Safety and Health Award, Citation of merit to the employees for working without a Lost Time Injury or Illness.

United Way Bronze Award for Commuity Involvement

Our company was a founding member of the Mantua Grove Community Advisory Panel, started in 1994. Includes 40 community members, local business, industries, residents, educators, emergency responders, etc.

The site was the 2002 Recipient of the Huntsman President's Global EHS Award for Safety and Health performance. This is the highest presentation for EHS award to a Huntsman site.

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- ♦ Confirm that your EMS meets the Performance Track requirements.
- ♦ Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

Read the EMS requirements on page 9-12 of instructions.
Tell us if your EMS meets these requirements for:

- 1** Environmental policy _____ ☒ Yes ☐ No
- 2** Planning _____ ☒ Yes ☐ No
- 3** Implementing and operation _____ ☒ Yes ☐ No
- 4** Checking and corrective action _____ ☒ Yes ☐ No
- 5** Management review _____ ☒ Yes ☐ No
- 6** Have you done a comprehensive review of all activities conducted at your facility that could impact the environment? (i.e., have you done an aspect analysis?) ☒ Yes ☐ No
- 7** Have you classified your aspects based on their potential harm to the environment, on community concerns, and/or on other objective factors? (i.e., have you determined your significant aspects?) ☒ Yes ☐ No
- 8** When did you last update your aspect analysis? (mo/yr) October 2002
- 9** Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes ☐ No
- 10** Did this cycle include both an EMS and a compliance audit? ☒ Yes ☐ No
- 11** Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes ☐ No

If yes, what method of EMS assessment did you use?

Self-assessment

Third-party assessment

☐ GEMI

☐ ISO 14001 Certification

☐ CEMP

☒ Other ERM consultant
EMS assessment 1999

☒ Other Huntsman
Corporate EMS
Assessment 1999 & 2001.
Site EMS self-assessment
2002

Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

Part 1 You must report past achievements for at least two environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the instructions.

Please quantify each of your aspects using the units listed for that aspect in the Environmental PTrack Information Hotline at 1-888-339-PTRK.

Note to small facilities: If you are a small facility, you must report past achievements for only one environmental aspect.

First achievement

1 What aspect have you selected from the Table on page 29-31?	Hazardous Solid Waste	
2 What units are you using to quantify this aspect? (See Table, page 29-31.)	Pounds	
	PAST	CURRENT
3 List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	14,085	4,903
4 What are the years for which you are reporting these quantities?	1999	2001
5 Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	0.97	1.0
6 What is your normalizing factor based on (e.g., production, employment)?	Production rates	

<p>7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?</p>	<ul style="list-style-type: none"> • Some materials were sold as a product that requires less stringent specifications • Equipment that needs flushing with solvent was replaced with self cleaning equipment not requiring solvent • Cleaning solutions for parts were replaced with non-hazardous solutions • People ordered chemicals in smaller quantities
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Section C, continued

Second achievement

1 What aspect have you selected from the Table on page 29-31?	Total Solid Waste	
2 What units are you using to quantify this aspect? (See Table, page 29-31.)	Pounds	
	PAST	CURRENT
3 List the past annual quantity of the aspect (from two years ago) and the current annual quantity of the aspect (from the most recent year for which you have data).	168,400	10,200
4 What are the years for which you are reporting these quantities?	1999	2001
5 Estimate your past normalizing factor (Page 18 of the Instructions will help you calculate this.)	0.97	1.0
6 What is your normalizing factor based on (e.g., production, employment)?	Production rates	
7 You reported an improvement in the quantity of the aspect in Question 3. How did you achieve this improvement?	Materials were reused in other product formulations or sold for other applications with less stringent specifications vs. disposal through fuel blending.	

Part 2 You must make future commitments for at least four environmental aspects, and you must choose these aspects from the Environmental Performance Table on pages 29-31 of the Instructions. The aspects you select for your future commitments should be related to the objectives and targets in your EMS. Where possible, they also should be identified as having a significant environmental impact in your EMS. No more than two of your aspects can be from the same environmental category. If you're not sure how your objectives and targets fit into our aspects or whether your aspects are significant, call the PTrack Information Hotline at 1-888-339-PTRK.

Once you have chosen your four environmental aspects, then fill in all the necessary information for these aspects in the tables on pages 7-10 of this form. Please quantify each of your aspects using the units listed for that aspect in the Environmental Performance Table. Each table that you must fill in corresponds to one of the environmental aspects you have chosen.

We will assume that your performance commitments are based on a constant production or employment level. If you would like to base your commitment on changing production or employment, please fill out optional questions 6a and 6b.

Note to small facilities: If you are a small facility, you must report future commitments for only two environmental aspects.

Section C, continued

First commitment

1 What aspect have you selected from the Table on pages 29-31?	Total energy use (electrical)	
2 What units are you using to quantify this aspect?	Kwh	
3a Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3b If no, please explain why you believe this aspect should be included as a performance commitment.		
	CURRENT	FUTURE
4 List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	5,487,000	6,364,000
5 What are the years for which you are reporting these quantities?	2001	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.18
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	<ul style="list-style-type: none"> • Replace, order motors, HVAC and others with more efficient units • Set back of temperatures in buildings • Changes to more efficient lighting units • Energy awareness training for employees • Electrical energy will be reduced in this commitment to less than the proportional increase in production. • Installation of electrical monitoring equipment to measure and record. Power use at about 5-10 key power use locations. This equipment will track energy use, evaluate where we could possibly reduce power use, identify high power use areas and help to evaluate changes we make to reduce consumption. 	
8a Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Section C, continued

8b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.

Second commitment

1	What aspect have you selected from the Table on pages 29-31?	Total Energy Use (natural gas)	
2	What units are you using to quantify this aspect?	MMBTU	
3a	Is this aspect considered significant in your EMS?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
3b	If no, please explain why you believe this aspect should be included as a performance commitment.		
		CURRENT	FUTURE
4	List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	29.3 MMBTU	33.7 MMBTU
5	What are the years for which you are reporting these quantities?	2001	2005
6a	(Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.18
6b	(Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
7	You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	<ul style="list-style-type: none"> Monitoring of exhaust and ventilation systems to reduce exhaust of conditioned air. Installation of automated energy management systems - Set back of temperatures in work areas. -Control of off hours heating to lower levels . Awareness education of employees Reflects a 3% proportional reduction in natural gas use for heating, production and steam generation 	
8a	Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

<p>8b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.</p>	
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Section C, continued

Third commitment

1 What aspect have you selected from the Table on pages 29-31?	Total water use	
2 What units are you using to quantify this aspect?	Gallons	
3a Is this aspect considered significant in your EMS?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
3b If no, please explain why you believe this aspect should be included as a performance commitment.	New Jersey was in a drought emergency in 2002. This is an area that will continue to have high profile focus by the NJ Department of Environmental Protection.	
	CURRENT	FUTURE
4 List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	5,403,000	6,213,000
5 What are the years for which you are reporting these quantities?	2001	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.18
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?	Production	
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	<ul style="list-style-type: none"> • The total water use reflects a 3% proportional reduction in water use verses a proportion increase in production. • Reuse boiler blow down for cooling tower or other use • Reduce once through cooling water on one production blender • Minimize lawn watering • Full utilization of blender spray wash system 	
8a Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
8b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.	N/A	

Section C, continued

Fourth commitment

1 What aspect have you selected from the Table on pages 29-31?	Emission VOC's	
2 What units are you using to quantify this aspect?	Pounds	
3a Is this aspect considered significant in your EMS?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
3b If no, please explain why you believe this aspect should be included as a performance commitment.	State of New Jersey encourages use of Van Pools and carpools. This commitment allows employee participation in one aspect of reducing emission reduction.	
	CURRENT	FUTURE
4 List the current annual quantity of the aspect and the annual quantity you are committing to achieve by the end of the third year of your participation in Performance Track.	7441	5803
5 What are the years for which you are reporting these quantities?	2001	2005
6a (Optional) What is your future normalizing factor. (Page 21 of the Instructions will help you calculate this.)	1.0	1.0
6b (Optional) What is your normalizing factor based on (e.g., production, employment)?	Employment is projected to not increase above the 2001 level	
7 You committed to an improvement in the quantity of this aspect in Question 4. How do you plan to achieve this improvement?	Van Pool program expansion to up to 5 vans. Encourage employee participation. Help subsidize costs. We assume each person employed at the site travels about eighty (80) miles to work roundtrip. VOC emissions based on 0.0026 pounds of VOCs per mile driven. Based on 159 Huntsman employees in 2001, current figure does not include 3 Van Pools started before 2001.	
8a Are you subject to Federal, State, tribal, or local regulatory requirements for this aspect?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
8b If yes, please list those requirements, including the quantitative limits and compliance deadlines that apply to you. Explain how your commitment exceeds requirements.		

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- ♦ Describe your approach to public outreach.
- ♦ List three references who are familiar with your facility.

Section D

Tell us about your public outreach and reporting.

1 How do you identify and respond to community concerns?

1. We have a detailed process to reply to community concerns/complaints. This is detailed in our site procedure, EP202 Complaints from the Community.

2. Through community outreach via Mantua Grove Community Advisory Panel, over 40 members. The group meets 9 times per year discusses issues concerning the community, industry and public. "Open and honest" reports are given by each member company to the members. These report items such as:

- business outlook update
- employment opportunities and changes
- status of environment programs, actions taken, legislation affecting business and community, permits, etc.
- safety and health reporting, OSHA recordables and lost time accidents, violations and rewards

3. Through membership in various community groups, i.e. local plant executives group, United Way, Gloucester County College Foundation, Gloucester County Institute of Technology business connection, SJ Chamber of Commerce, etc.

4. Each year we invite about 30 teachers to tour our facility. We explain our business, products and safety programs and environmental activities. This program is organized and given by our employees, about 15-20 participate. We receive feedback and questions from the teachers.

2 How do you inform community members of important matters that affect them?

Same as items 2 and 3 in above question/

3 How will you make the Performance Track Annual Performance Report available to the public?

☒ Website www.huntsman.com/pu

☒ Newspaper (press releases)

☒ Open Houses

☒ Other

Community Advisory Panel, teacher and student site tours

4 Are there any ongoing citizen suits against your facility?

☐ Yes

☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
<i>Representative of a Community/Citizen Group</i>	Mantua Grove Community Advisory Panel	Ray Kohler, Facilitator	(856) 423-8435 (856) 423-8591 (FAX)
<i>State/tribal/local regulator</i>	State Senator District #3	Stephen M. Sweeney	(856) 455-1011 (856) 455-2853 (FAX)
<i>Other community/local reference (e.g., emergency management official or business associate)</i>	Gloucester County College	Dick Smith, Executive Director	(856) 415-2230

Section E

Application and Participation Statement.

On behalf of Huntsman Polyurethanes
[my facility],

I certify that

I have read and agree to the terms and conditions for Application and Participation in the National Environmental Performance Track, as specified in the *National Environmental Performance Track Program Guide* and in the *Application Instructions*;

- I have personally examined and am familiar with the information contained in this Application, including the Environmental Requirements Checklist. The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Performance Track EMS requirements, including systems to maintain compliance with all applicable Federal, State, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all Federal, State, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable Federal, State, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title

Mr. Raymond L. Notaro. P.E.

Phone Number/E-mail

(856) 423-8560 // raymond_l_notaro@huntsman.com

Facility Name

Huntsman Polyurethanes

Facility Street Address

286 Mantua Grove Road

City/State/Zip Code

West Deptford, NJ 08066-1732

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 40 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S.

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK (7875) or e-mail ptrack@indecon.com.

To submit your application:

- 1) E-mail the completed application to ptrack@indecon.com,
and
- 2) Fax the completed and signed Section E (**not** the entire application) to
(617) 354-0463.

If you cannot e-mail the application, mail a hard copy of the entire completed application to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Environmental Requirements Checklist

Use the Environmental Requirements Checklist to answer Question 5 in *Section A, Tell us about your facility*. This Checklist will help you identify the *major* Federal, State, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

Fill in your facility information below and enclose the completed Checklist with your application.

Air Pollution Regulations

Check all that apply

- ☐ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☒ 2. Permits and Registration of Air Pollution Sources
- ☐ 3. General Emission Standards, Prohibitions, and Restrictions
- ☐ 4. Control of Incinerators
- ☐ 5. Process Industry Emission Standards
- ☒ 6. Control of Fuel Burning Equipment
- ☐ 7. Control of VOCs
- ☒ 8. Sampling, Testing, and Reporting
- ☐ 9. Visible Emissions Standards
- ☐ 10. Control of Fugitive Dust
- ☐ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

Other (you must list these if applicable)

- ☐ 13. Federal, State, tribal, or local regulations not listed above.
- ☒ 14. ID Numbers (specify whether State or Federal).
 - State Facility ID# 55253
 - State Air Permit #PCP960004
 - State Air Permit #PCP960005
 - State Air Permit #PCP960006
 - State Air Permit #PCP960007
 - State Air Permit #PCP960007
 - State Air Permit #PCP960009
 - State Air Permit #PCP960010
 - State Air Permit #PCP960011
 - State Air Permit #PCP960013
 - State Air Permit #PCP960015
 - State Air Permit #PCP960016
 - State Air Permit #PCP960022
 - State Air Permit #PCP970001
 - State Air Permit #GEN990001
 - State Air Permit #GEN000001

Hazardous Waste Management Regulations

Check all that apply.

- ☒ 1. Identification and listing of hazardous waste (40 CFR 261)
 - ☒ - Characteristic waste
 - ☒ - Listed waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - ☒ - Manifesting
 - ☒ - Pre-transport requirements
 - ☒ - Record keeping/reporting
- ☐ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - ☐ - Transfer facility requirements
 - ☐ - Manifest system and record-keeping
 - ☐ - Hazardous waste discharges
- ☐ 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - ☐ - General facility standards
 - ☐ - Preparedness and prevention
 - ☐ - Contingency plan and emergency procedures
 - ☐ - Manifest system, record-keeping, and reporting
 - ☐ - Groundwater protection
 - ☐ - Financial requirements
 - ☐ - Use and management of containers
 - ☐ - Tanks
 - ☐ - Waste piles
 - ☐ - Land treatment
 - ☐ - Incinerators
- ☐ 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- ☐ 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- ☐ 7. Administered Permit Program (Part B) (40 CFR 270)

Other (you must list these if applicable)

- ☐ 8. Federal, State, tribal, or local regulations not listed above
- ☒ 9. ID Numbers (specify whether State or Federal).
State Permit #NJD000692970

Hazardous Materials Management

Check all that apply.

- ☐ 1. Control of Pollution by Oil and other Hazardous Substances (33 CFR 153)
- ☒ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- ☒ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ☒ 5. Community Right-to-Know Regulations (40 CFR 350-372)
- ☐ 6. Underground Storage Tank Regulations (40 CFR 280-282)

Other (you must list these if applicable)

- ☐ 7. Federal, State, tribal, or local regulations not listed above.
- ☐ 8. ID Numbers (specify whether State or Federal).

Solid Waste Management

Check all that apply.

- ☐ 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- ☐ 2. Permit Requirements for Solid Waste Disposal Facilities
- ☐ 3. Installation of Systems of Refuse Disposal
- ☒ 4. Solid Waste Storage and Removal Requirements
- ☐ 5. Disposal Requirements for Special Wastes

Other (you must list these if applicable)

- ☐ 6. Federal, State, tribal, or local regulations not listed above.
N/A
- ☐ 7. ID Numbers (specify whether State or Federal).
No, permit numbers are issued, we collect solid waste in a trash compactor and it is hauled to an approved incinerator by Waste Management, Inc. Materials such as paper, glass, metal, printer cartridges, etc. are collected separately and recycled.

Water Pollution Control Requirements

Check all that apply.

- ☐ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☐ 2. Designation of Hazardous Substances (40 CFR 116)
- ☐ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☒ 4. NPDES Permit Requirements (40 CFR 122)
- ☐ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☐ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
Name of POTW
ID # of POTW
- ☐ 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- ☐ 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- ☐ 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- ☐ 10. Water Quality Standards
- ☐ 11. Effluent Limitations for Direct Dischargers
- ☒ 12. Permit Monitoring/Reporting Requirements
- ☐ 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- ☐ 14. Collection, Handling, and Processing of Sewage Sludge
- ☐ 15. Oil Discharge Containment, Control and Cleanup
- ☐ 16. Standards Applicable to Indirect Discharges (Pretreatment)

Other (you must list these if applicable)

- ☒ 17. Federal, State, tribal, or local regulations not listed above.
Gloucester County Utility Authority Regulations for discharges to the POTW.
- ☒ 18. ID Numbers (specify whether State or Federal).
State Stormwater Permit #NJ0033588

About 25,000 gallons per day of domestic and process waters are discharged to the Gloucester County Utility Authority (GCUA) wastewater treatment plant. The waste water is below-trigger points for pretreatment and we are not required to have an industrial waste permit.

Drinking Water Regulations

Check all that apply.

- ☐ 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- ☐ 2. National Primary Drinking Water Standards (40 CFR 141)
- ☐ 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- ☐ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 5. Underground Injection Control Requirements
- ☐ 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems

Other (you must list these if applicable)

- ☐ 7. Federal, State, tribal, or local regulations not listed above.
N/A
- ☐ 8. ID Numbers (specify whether State or Federal).
N/A

Toxic Substances

Check all that apply.

- ☒ 1. Manufacture and Import of Chemicals, Record-keeping and Reporting Requirements (40 CFR 704)
- ☒ 2. Import and Export of Chemicals (40 CFR 707)
- ☒ 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
- ☒ 4. Chemical Information Rules (40 CFR 712)
- ☒ 5. Health and Safety Data Reporting (40 CFR 716)
- ☒ 6. Pre-Manufacture Notifications (40 CFR 720)
- ☐ 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
- ☐ 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- ☐ 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

Other (you must list these if applicable)

- ☐ 10. Federal, State, tribal, or local regulations not listed above.
None
- ☐ 11. ID Numbers (specify whether State or Federal).
None

Pesticide Regulations

Check all that apply.

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures Storage and Disposal of Pesticides and Containers (40 CFR 165)
- ☐ 3. Certification of Pesticide Applications (40 CFR 171)
- ☐ 4. Pesticide Licensing Requirements
- ☐ 5. Labeling of Pesticides
- ☐ 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- ☐ 7. Disposal of Pesticide Containers
- ☐ 8. Restricted Use and Prohibited Pesticides

Other (you must list these if applicable)

- ☐ 9. Federal, State, tribal, or local regulations not listed above.
Does Not Apply
- ☐ 10. ID Numbers (specify whether State or Federal).
Does Not Apply

Environmental Clean-Up, Restoration, Corrective Action

- ☐ 1. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund). Please identify and include date of Record of Decision.
- ☐ 2. RCRA Corrective Action. Please provide date of RCRA/HSWA permits that require corrective action.
- ☒ 3. Other Federal, State, tribal, or local environmental clean-up, restoration, corrective action regulations not listed above. Please include date of requirement.

ISRA, cleanup activities for oil storage tanks and solvents

Facility Name Huntsman Polyurethanes

Facility Location: 286 Mantua Grove Road
West Deptford, NJ 08066-1732